## QUARTERLY PREVENTIVE MAINTENANCE & EQUIPMENT INSPECTION

Name of Inspector: STACEY COLLETTE Date of Inspection: 1-17-08
Inspector's Signature:
Diesel Storage Tanks and Dispensing Area: leak detection and high level alarm systems hydrocarbon detection/rain diversion system
secondary containment and spill pads - NEGD TO LABEL  tertiary containment structure -?
overflow line - 7.  interstitial drain valve/fittings - 7.  dispensing area and hoses
tank loading piping and systems external tank surfaces
external tank surfaces  general area and containment structure  Gasoline Storage Tank and Dispensing Area:  leak detection and high level alarm systems  secondary containment and drip pan  Secondary containment and drip pan
spill absorbent pads containment structure
dispensing area and hoses tank loading piping and systems N external tank surfaces general area and tertiary containment structure
Hazardous Materials/Waste Storage and Accumulation Areas secondary containment pallets, devices or similar equipment  condition of storage cabinets (if present)
spill absorbent pads Maintenance Building  leak detection and high level alarm systems
secondary containment interstitial drain valve/fitting tank unloading piping and evetoms

Crone Shippy Sweep Meeds Clearly Crone Shippy Sweep Meeds Clearly Beam 123 Hoses meed bruket to arturn Hydrendi Hose that are dieronnex Oil area Meed to bee under Gover Chock block finel truck 905 4901 Meed to order 902 NO Braks at all

### QUARTERLY PREVENTIVE MAINTENANCE & EQUIPMENT INSPECTION

	<b>⊋</b>	external tank surfaces
	<u>.</u>	external tank surfaces  general area
	o.	
	<b>0</b> -	
	ũ	
	RTG N	Maintenance/Repair Area & Covered Equipment Storage Area:
		leak detection and high level alarm systems
	•	secondary containment
		· · · · · · · · · · · · · · · · · · ·
		secondary containment interstitial drain valve/fittings
		The first the same of the same
		oil hoses and fittings
	Q	The many states of a constant of the states
		tank loading piping and systems
		The state of the s
		external tank surfaces
	_	
	ū	general area
		1 Line long
		Container Storage Areas
		Emergency Diesel Generators
		Steam cleaning area and associated oil/water separator
	Ø	Air compressors at Power Shop, M&R Chassis Shop
	· ' /	
	7	Tire Mount Canopy
	4	Air compressors at Power Shop, M&R Chassis Shop  Tire Mount Canopy  Claude Model And Chassis Shop
		Carl Carl
Preventi	ve Main	tenance
		1. Is the integrity of all impervious surfaces intact and in good condition? yes no
		If no, identify the surfaces that need to be repaired
		2. Are all aboveground tank systems (including lines and fittings) intact and in good condition? yes
		no
		If no, identify any tanks or tank fittings with leaks or other problems and the steps taken to repair
		the leak or problem(s)
		Are all aboveground tank leak detection and high level alarm systems operating and in good
		and the same tark took dottodon and right love alaint systems operating and in quod

3. Are all aboveground tank leak detection and high level alarm systems operating and in good working condition? yes no

If no, identify any malfunctioning and the steps taken to repair or replace the system

4. Are hazardous materials/wastes stored in appropriate storage areas? yes no If no, move all hazardous materials/wastes to appropriate storage area.

5. Are hazardous material/waste storage containers intact, tightly closed, clean and free of external residues and in good condition? yes no If no, list the containers that are damaged or otherwise improper and the steps being taken

to repair/replace them or correct the problem.

6. Are all storm water conveyance system devices (i.e. slotted drains, trench drains, etc.) intact and in good condition? yes no

If no, list the devices that are damaged and the steps being taken to repair/replace them.

7. Is all other above-listed equipment and areas (air compressors, emergency generators, steam clean area) in good condition and free of oils, residues or debris? yes no

If no, identify any equipment or areas with leaks or other problems and the steps taken to repair the leak or problem(s).

It a tire Grewe build up on Ground On 6 nound brief upon tanks H12 Shippy Dweep on Grown Med clean of. Parka transtanion actions head under Ola Man- Paint on pullets need to be Paint Marine so near to be unseile Cortum Empt Drum more into over with other House Cleaming between Continuing & Creme -housed people Continuin?

# QUARTERLY PREVENTIVE MAINTENANCE & EQUIPMENT INSPECTION

## HOUSEKEEPING PRACTICES

<ol> <li>Are the parking areas and roadways kept clean of residues and debris (particularly container storage and reefer storage areas and the Trouble Parking Area)? yes no If no, identify the areas which needs to be cleaned</li> <li>Is all machinery kept clean of debris and oils? yes no If no, identify the machinery that needs to be cleaned</li> <li>Are hazardous material storage areas and outside material loading and unloading areas kept clean of oil, residues and debris? yes no If no, identify the areas which needs to be cleaned</li> <li>Are storm water drainage discharge points kept clean of debris and oils? yes no If no, identify the areas that need to be cleaned</li> </ol>			
SPILL PREVENTION AND RESPONSE			
<ol> <li>Is spill cleanup equipment kept in key locations to expedite spill response? yes no If no, list the equipment to be obtained and the location where it will be stored.</li> <li>If a spill occurred, were the proper reporting and cleanup procedures followed? yes no If no, explain:</li> </ol>			
3. Has the cause of any spill been determined to attempt to prevent a repeat? yes no If no, evaluate each spill that occurred during the past month and develop a procedure to prevent a recurrence			
FOLLOW UP			
Have any deficiencies identified during the previous month's inspection been corrected? yes  If no, provide the projected date for corrective action			
ADDITIONAL COMMENTS - REMARKS			
e			



#### Jeremy Johnstone/R9/USEPA/US

12/20/2007 01:56 PM

To "Paul Richey" <pri>prichey@trapac.com>

CC

bcc

Subject RE: Findings of Violation/Order for Compliance - Docket No. CWA-309(a)-08-015 - Request for Compliance Order

Extension

Mr. Richey -

I am not certain from reading your last email message if, by correcting the expected delivery date of information from the Port of Los Angeles, you also intended to concomitantly shorten your request for an extension. Be that as it may, I have consulted my management and your request of an extension until Jan. 24, 2008 is acceptable. Please be advised that we expect to have <u>received</u> the materials by this date. Also, if you are able to finish the work sooner, then we would appreciate receiving any materials as soon as they are ready.

Thank you, please feel free to contact me if you have any further questions, and have a pleasant holiday season.

Jeremy Johnstone

Senior Environmental Engineer

Clean Water Act Compliance Office (WTR-7)

U.S. Environmental Protection Agency, Region 9

Tel: 415-972-3499 Fax: 415-947-3545

email: johnstone.jeremy@epa.gov "Paul Richey" <prichey@trapac.com>



"Paul Richey" <prichey@trapac.com>

12/17/2007 08:47 AM

To Jeremy Johnstone/R9/USEPA/US@EPA

CC

Subject RE: Findings of Violation/Order for Compliance - Docket No. CWA-309(a)-08-015 - Request for Compliance Order Extension

Mr. Johnstone;

Please forgive my error in noting the Port's projected best production date for the drawings. It reads Dec. 28th, but it should read Dec. 21. My apologies.

> ----Original Message----

> From:

Paul Richey

> Sent: Friday, December 14, 2007 10:47 AM

> To:

'johnstone.jeremy@epa.gov'

> Cc:

Frank Pisano

> Subject:

Findings of Violation/Order for Compliance - Docket No.

CWA-309(a)-08-015 - Request for Compliance Order Extension

> Importance:

High

> Mr. Johnstone;

> Pursuant to our conversation this morning, please note that our revised SWPPP is 90-95% complete and near ready for submission. However, the necessary facility drawings or blueprints to depict the drainage flow and outflow locations must be secured from the Port of Los Angeles, Engineering Dept., and then presented to our graphics vendor for incorporation in the plan. The drawings were requested from the Port of Los Angeles this week, with their best expected response to be the end of next week (i.e. Dec. 28th). Unfortunately, the 28th is not a guaranteed delivery date, and with the holiday fast approaching, delayed receipt of the drawings may press the response deadline of Jan. 9, 2008.

> In view of these circumstances, we respectfully request an extension for response to the compliance order to ensure avoiding a delinquent submission. We anticipate that no more than 15 days beyond the current due date would be necessary. This would obligate our response to be no later than Jan. 24, 2008. Please advise whether or not you are agreeable to our request.

> We thank you for your consideration, and look forward to your reply.

> Regards,